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ATTORNEY FOR FORD MOTOR CREDIT COMPANY LLC

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

IN RE: §  
§  
NATIONAL RIFLE ASSOCIATION OF §  
AMERICA, § CASE NO. 21-30085-SGJ-11  
§ DEBTOR, §  
§  
FORD MOTOR CREDIT COMPANY LLC, §  
MOVANT, §  
§  
VS. § A Hearing on the Motion for  
§ Relief from the Automatic Stay  
§ or, in the Alternative, Request  
§ for Adequate Protection set:  
§ **MARCH 25, 2021 AT 1:30 P.M.**  
NATIONAL RIFLE ASSOCIATION OF §  
AMERICA, §  
RESPONDENT. §

**MOTION FOR RELIEF FROM THE AUTOMATIC STAY**  
**OR, IN THE ALTERNATIVE, REQUEST FOR ADEQUATE PROTECTION**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Ford Motor Credit Company LLC, servicer for CAB East LLC ("Ford") complaining of National Rifle Association of America ("Debtor") and for cause would respectfully show the Court as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. § 157 and 11 U.S.C. §§ 362 and 365. This is a core proceeding.

2. Ford is a corporation doing business in Texas. Debtor is a corporation which may be served at 11250 Waples Mill Road, Fairfax, VA 22030.

**WITH REGARD TO THE 2017 FORD EXPEDITION, VIN ENDING IN 4902**

3. Ford is a lessor of a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902 to Debtor.

4. The lease payments are \$910.49 per month. As of February 24, 2021, the account was due for the January 30, 2021 payment and all payments due since that time. The total arrears due as of February 24, 2021 were \$910.49.

**WITH REGARD TO THE 2018 FORD EXPLORER**

5. Ford is a lessor of a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775 to Debtor.

6. The lease payments are \$565.07 per month. As of February 24, 2021, the account was due for the January 25, 2021 payment and all payments due since that time. The total arrears due as of February 24, 2021 were \$565.07.

**WITH REGARD TO THE 2017 FORD EXPEDITION, VIN ENDING IN 5442**

7. Ford is a lessor of a 2017 Ford Expedition, Vehicle Identification Number 1FMJU1JT2HEA85442 to Debtor.

8. The lease payments are \$799.91 per month. As of February 24, 2021, the account was due for the February 15, 2021 payment and all payments due since that time. The total arrears due as of February 24, 2021 were \$801.78.

**WITH REGARD TO ALL VEHICLES**

9. But for the automatic stay, Ford could and would terminate the Lease and repossess the vehicles it leases to Debtor.

10. Ford does not have and Debtor is not able to offer adequate protection of Ford's interest in the vehicle.

11. Debtor has no equity in the vehicles or the Lease and same are not necessary for an effective reorganization.

12. Debtor should be compelled to reject the unexpired lease because Debtor cannot promptly cure the existing arrearage and provide adequate assurance of future performance under the terms of the unexpired lease as required in 11 U.S.C. § 365.

13. Further cause may exist to terminate the automatic stay if the vehicle is not properly insured. Ford hereby demands proof of insurance.

14. Because the leased vehicle described herein depreciates and may not be insured, any Order either terminating or conditioning the automatic stay should be effective immediately and there should be no stay of the Order for fourteen days after the entry of the Order.

WHEREFORE, PREMISES CONSIDERED, Ford Motor Credit Company LLC prays for:

1. An Order of this Court granting Ford relief from the automatic stay imposed pursuant to 11 U.S.C. § 362 and compelling Debtor to reject the lease;

2. An Order of this Court authorizing Ford to take immediate possession of the vehicle which is the subject of this Motion and dispose of the vehicle without further notice to Debtor or any other party in interest;

3. In the alternative, an Order of this Court requiring Debtor to provide Ford with adequate protection of its interest and to promptly cure existing arrearage to Ford and remain current on Debtor's obligations to Ford;

4. An Order of this Court finding that any Order entered with regard to this Motion should be effective immediately upon its entry and should not be stayed for fourteen days following the entry of said Order; and

5. For such other and further relief, both general and specific, to which Ford may show itself justly entitled.

Respectfully submitted,

/s/ Stephen G. Wilcox

Stephen G. Wilcox

State Bar Number 21454300

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ATTORNEY FOR FORD MOTOR CREDIT  
COMPANY LLC

**NOTICE REGARDING REQUIRED ANSWER**

**PURSUANT TO LOCAL BANKRUPTCY RULE 4001-1(b), A RESPONSE IS REQUIRED  
TO THIS MOTION, OR THE ALLEGATIONS IN THE MOTION MAY BE DEEMED  
ADMITTED, AND AN ORDER GRANTING THE RELIEF SOUGHT MAY BE ENTERED  
BY DEFAULT.**

**ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK OF THE  
UNITED STATES BANKRUPTCY COURT AT EARLE CABELL FEDERAL BUILDING,  
1100 COMMERCE ST., RM. 1254, DALLAS, TX 75242-1496 BEFORE CLOSE OF  
BUSINESS ON MARCH 10, 2021, WHICH IS AT LEAST 14 DAYS FROM THE DATE OF  
SERVICE HEREOF. A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING  
PARTY AND ANY TRUSTEE OR EXAMINER APPOINTED IN THE CASE. ANY  
RESPONSE SHALL INCLUDE A DETAILED AND COMPREHENSIVE STATEMENT AS  
TO HOW THE MOVANT CAN BE “ADEQUATELY PROTECTED” IF THE STAY IS TO  
BE CONTINUED.**

**CERTIFICATE OF CONFERENCE**

I, the undersigned, hereby certify that prior to the filing of this Motion, I did the following: My office contacted Debtor's attorney's office regarding opposition to the Motion and although there was a response, it was not specific as to the Motion being opposed or unopposed.

/s/ Stephen G. Wilcox

Stephen G. Wilcox

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing Motion for Relief from the Automatic Stay, or, in the Alternative, Request for Adequate Protection was served by FIRST CLASS MAIL, POSTAGE PREPAID on:

National Rifle Association of America  
11250 Waples Mill Road  
Fairfax, VA 22030

and to all parties listed on the attached mailing matrix;

and by ELECTRONIC FILING on:

Patrick Neligan, Jr.  
325 N. St Paul, Suite 3600  
Dallas, TX 75201

United States Trustee  
1100 Commerce St., Room 976  
Dallas, TX 75202

on February 24, 2021.

/s/ Stephen G. Wilcox  
Stephen G. Wilcox

**SUMMARY OF EXHIBITS**

1. Commercialease Master Lease Agreement dated July 5, 2014.
2. Supplement to Commercialease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902.
3. Certificate of Title on a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902.
4. Motor Vehicle Lease Agreement dated April 25, 2018 on a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775.
5. Certificate of Title on a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775.
6. Supplement to Commercialease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJU1JT2HEA85442.
7. Certificate of Title on a 2017 Ford Expedition, Vehicle Identification Number 1FMJU1JT2HEA85442.
8. Affidavit of representative of Ford Motor Credit Company.

\*Copies of Exhibits are available by written request to:

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1702-37196-525652